

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	
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Stephanie Allen,	:	Case No. 15-22517-RDD
Debtor	:	Judge Robert D. Drain
	:	
	:	

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OBJECTION TO APPLICATION TO AVOID JUDICIAL LIEN  
OBJECTION TO EXEMPTIONS  
MOTION TO DISMISS FOR ABUSE UNDER SECTION 707(b)

Richard M. Allen (“Creditor”), a creditor of the debtor (“Debtor”) objects to the Debtor’s Application to Avoid a Judicial Lien (“Application”) filed on June 19, 2015, and states as follows:

1. Creditor has filed a motion seeking to conduct a Rule 2004 examination of Debtor. Creditor believes that such examination will significantly alter Debtor’s financial disclosures, including those underlying the Application. Therefore, the Application and the relief sought thereby are premature.
2. Debtor has misstated and inaccurately described Creditor’s claims and the amounts thereof.
3. Debtor is not entitled to the exemptions claimed in the amounts claimed, to which Creditor objects.
4. Debtor has failed to disclose significant assets and/or has fraudulently transferred significant assets.

5. Debtor has entered false information on her schedules.
6. Debtor does not meet the means test of chapter 7 and consequently substantial abuse of Rule 1017(e) has occurred, and Creditor moves to dismiss the case.

WHEREFORE, Creditor respectfully requests (a) that the Application be denied or, alternatively, that the Court set a hearing thereon, (b) that Debtor's claimed exemptions be set aside and (c) that the case be dismissed.

Respectfully submitted,

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Richard M. Allen  
Pro se  
223 Egremont Plain Road  
Egremont, MA 01230  
413-528-2108  
rmallencsm@gmail.com